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ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**ALI SALEEM BEY and JOHN
MUHAMMAD BEY,**

Plaintiffs,

vs.

CITY OF OAKLAND, et al.,

Defendants

Case No: 14-cv-01626-JSC

**DECLARATION OF CHARLES A.
BONNER IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

Hearing Date:
Time:
Courtroom: F
Location: 15th Floor
450 Golden Gate Ave.
San Francisco, CA

Judge: The Hon. Jacqueline S. Corley

I, A. CABRAL BONNER, declare as follows:

1. I am an attorney duly licensed by the State of California duly to practice law before all courts in the State of California including the United States District Court for the Northern District of California.

2. My business address is 475 GATE FIVE ROAD, SUITE 212, SAUSALITO, CA 94965

3. I have personal knowledge of the matters set forth herein, except those stated on information and belief. If called as a witness I could competently testify thereto.

4. PLAINTIFFS have brought this action to address Oakland Police Department

DECLARATION OF A. CABRAL BONNER IN SUPPORT OF PLAINTIFF'S AMENDED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL

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1 (“OPD”) accountability, and to evaluate and mandate compliance with the Negotiated
2 Settlement Agreement. (“NSA”).

3 5. The following documents from the Declaration of Ali Saleem Bey in Support of
4 Plaintiffs’ Reply Brief [Doc. 132] contain confidential information and should be filed
5 under seal in their entirety:

- 6 a. Exhibit 27, Longmire DOJ Testimony
- 7 b. Exhibit 28, Complaint Investigation Report, March 18, 2014;
- 8 c. Exhibit 30, Joyner, DOJ Testimony
- 9 d. Exhibit 33, Longmire DOJ Testimony
- 10 e. Exhibit 35, Joyner, DOJ Testimony
- 11 f. Exhibit 36, Joyner, DOJ Testimony
- 12 g. Exhibit 38, Longmire DOJ Testimony
- 13 h. Exhibit 39, Longmire DOJ Testimony
- 14 i. Exhibit 40, DOJ Investigation of Longmire Cover
- 15 j. Exhibit 41, Joyner, DOJ Testimony
- 16 k. Exhibit 42, Joyner, DOJ Testimony

17 6. The following documents contain confidential information and should be filed
18 redacted:

- 19 a. Declaration of Ali Saleem Bey in Support of Plaintiffs’ Reply Brief [Doc. 132]
- 20 b. Declaration of John Bey in Support of Plaintiffs’ Reply Brief [Doc. 131]

21
22 I declare under penalty of perjury under the laws of the United States of America and the State of
23 California that the foregoing is true and correct.

24 Executed on this 9th day of March, 2018 in Sausalito, California.

25
26 By: /s/CHARLES A. BONNER

27 CHARLES A. BONNER
28 Attorney for Plaintiff